

Inner City Press

March 31, 2021

By E-mail to HellersteinNYSDChambers@nysd.uscourts.gov

Hon. Alvin K. Hellerstein, United States District Judge
Southern District of New York, 500 Pearl Street New York, NY 10007

Re: Press application to unseal, with limited redactions if required, filings in US v. Coro, 19-cr-144 (AKH)

Dear Judge Hellerstein:

This concerns, in the above-captioned criminal case that relates inter alia to US sanctions on Venezuela, the complete sealing of filings.

These are clearly judicial documents. And there is a public interest in US sanctions, on Venezuela and elsewhere, and their enforcement and violation and all filings in such cases.

Mr. Coro's counsel this evening filed that "Notice is hereby given to the public.. that two sealed submissions, dated March 8, 2021 and March 22, 2021, were made by the defendant Victor Mones Coro." Docket No. 194.

While appreciating the notice, no legal argument justifying withholding in full, rather than redacting where absolutely necessary was provided. Inner City Press hereby opposes the sealing, and requests unsealing.

Covering this for Inner City Press, I have noted how many filings are listed as sealed: see, e.g., Docket 120 (10/13/20), and further back. Compare, Judge Jed S. Rakoff's request ruling on Inner City Press' request in US v. Weigand, viewable here: <https://www.documentcloud.org/documents/20513316-ipcunsealweigandjsrorder>. See also, Judge Broderick's recent docketing of Inner City Press' request to unseal in US v. Ashe / Piao, 15-cr-706, Docket No 999 (Inner City Press letter) and Docket 998 (ordering that the sealing be justified or removed by April 9).

Again, these too are, needless to say, judicial documents within the meaning of *United States v. Aref*, 533 F.3d 72, 81-83 (2d Cir. 2008) and *Lugosch v. Pyramid Co.*, 435 F.3d 110 (2d Cir. 2006) - they should be made available.

Please confirm receipt of and docket this application, and thank you for your attention to it.

Respectfully submitted,

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